



YOUR REF: 1:22-cv-00741-AJT-WEF
OUR REF: KF-2022-007617

The Senior Master of the Senior Courts of England and Wales, King's Bench Division presents her compliments to the United States District Court for the Eastern District of Virginia, Alexandria Division and has the honour to refer to Taking of Evidence in the Matter of Voltage Holdings LLC and others -v- Veeva Corporation and others.

The Senior Master requests that the Letter of Request be amended to include the following points:

☒ The address of Datacamp Limited.

The Senior Master welcomes this opportunity to renew to the United States District Court for the Eastern District of Virginia, Alexandria Division the assurance of her highest consideration.

Royal Courts of Justice
Room E16
Strand
London WC2A 2LL

Tel: 0044 (0)20 3936 8957 (option 7)
Fax: 0044 (0)870 324 0025
Email: ForeignProcess.RCJ@justice.gov.uk

Dated : 29-09-2022



**LETTER OF REQUEST
COMMISSION ROGATOIRE**

Hague Convention of 18 March 1970 on the
Taking of Evidence Abroad in Civil or Commercial Matters
*Convention de La Haye du 18 mars 1970 sur
l'obtention des preuves à l'étranger en matière civile ou commerciale*

RECEIVED

27 AUG 2022

ACTION QBD
DEPT.

1.	Sender <i>Expéditeur</i>	Office of the Clerk United States District Court for the Eastern District of Virginia, Alexandria Division 401 Courthouse Square Alexandria, VA 22414 USA
2.	Central Authority of the Requested State <i>Autorité centrale de l'État requis</i>	The Senior Master, Royal Courts of Justice For the attention of the Foreign Process Section Room E16 Royal Courts of Justice Strand, LONDON WC2A 2LL
3.	Person to whom the executed request is to be returned <i>Personne à qui les pièces constatant l'exécution de la demande doivent être renvoyées</i>	Kerry S. Culpepper Culpepper IP, LLC 75-170 Hualalai Road, Suite B204 Kailua Kona, HI 96740 tel: (808)-464-4047 E-mail: kculpepper@culpepperip.com
4.	Specification of the date by which the requesting authority requires receipt of the response to the Letter of Request <i>Indiquer la date limite à laquelle l'autorité requérante désire recevoir la réponse à la commission rogatoire</i>	
	Date <i>Date limite</i>	19 September 2022
	Reason for urgency* <i>Raison de l'urgence</i>	Plaintiffs need the information sufficient to identify the Defendants DOES 1-100 so they can be named in the lawsuit and it can proceed.

In conformity with Article 3 of the Convention, the undersigned applicant has the honour to submit the following request:

En conformité de l'article 3 de la Convention, le requérant soussigné a l'honneur de présenter la demande suivante :

5. a	Requesting authority (Art. 3(a)) <i>Autorité requérante</i> <i>(art. 3(a))</i>	United States District Court for the Eastern District of Virginia, Alexandria Division 401 Courthouse Square Alexandria, VA 22414 USA 757-222-7499
b	To the Competent Authority of (Art. 3(a)) <i>À l'Autorité compétente de</i> <i>(art. 3(a))</i>	The Senior Master, Royal Courts of Justice For the attention of the Foreign Process Section Room E16 Royal Courts of Justice Strand, LONDON WC2A 2LL

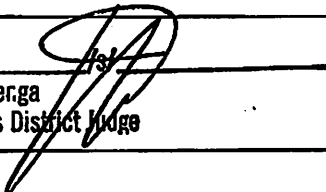
c	Names of the case and any identifying number <i>Nom de l'affaire et numéro d'identification de l'affaire</i>	1:22-cv-00741
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6.	Names and addresses of the parties and their representatives (including representatives in the Requested State*) (Art. 3(b)) <i>Identité et adresse des parties et de leurs représentants (y compris représentants dans l'État requis) (art. 3(b))</i>	
a	Plaintiff <i>Demandeur</i>	VOLTAGE HOLDINGS, LLC; AFTER II MOVIE, LLC; VENICE PI, LLC; WONDER ONE, LLC; SCREEN MEDIA VENTURES, LLC; AMERICAN CINEMA-INTERNATIONAL, INC.; and AMERICAN CINEMA INSPIRES, INC.
	Representatives <i>Représentants</i>	Kerry S. Culpepper Culpepper IP, LLLC 75-170 Hualalai Road, Suite B204 Kailua Kona, HI 96740 tel: (808)-464-4047 E-mail: kculpepper@culpepperip.com
b	Defendant <i>Défendeur</i>	VEEPN CORPORATION and DOES 1-100
	Representatives <i>Représentants</i>	Unknown
c	Other parties <i>Autres parties</i>	Not applicable
	Representatives <i>Représentants</i>	Not applicable

7. a	Nature of the proceedings (divorce, paternity, breach of contract, product liability, etc.) (Art. 3(c)) <i>Nature et objet de l'instance (divorce, filiation, rupture de contrat, responsabilité du fait des produits, etc.) (art. 3(c))</i>	Civil lawsuit based upon direct and contributory copyright infringement and trademark infringement.
b	Summary of complaint <i>Exposé sommaire de la demande</i>	This is a civil suit seeking money damages and permanent injunctive relief. Plaintiffs assert copyright infringement claims against Defendants who are reproducing, distributing and streaming unauthorized copies of Plaintiffs' copyright protected motion pictures.
c	Summary of defence and counterclaim* <i>Exposé sommaire de la défense ou demande reconventionnelle</i>	Unknown
d	Other necessary information or documents* <i>Autres renseignements ou documents Utiles</i>	Not applicable

8. a	Evidence to be obtained or other judicial act to be performed (Art. 3(d)) <i>Actes d'instruction ou autres actes judiciaires à accomplir (art. 3(d))</i>	Identification information for the customers of DataCamp Limited that were assigned Internet Protocol addresses at the dates shown in attached Exhibit "A" including (i) name
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		and contact information of the customer assigned the IP address; and (ii) payment records.
b	Purpose of the evidence or judicial act sought <i>But des actes à accomplir</i>	The purpose of the evidence sought is to obtain the identification of DataCamp's customers that are infringing Plaintiffs' copyrights so they can be served with the summons and complaint in the lawsuit
9.	Identity and address of any person to be examined (Art. 3(e))* <i>Identité et adresse des personnes à entendre (art. 3(e))</i>	Not Applicable
10.	Questions to be put to the persons to be examined or statement of the subject matter about which they are to be examined (Art. 3(f))* <i>Questions à poser ou faits sur lesquels les personnes susvisées doivent être entendues (art. 3(f))</i>	Not Applicable
11.	Documents or other property to be inspected (Art. 3(g))* <i>Documents ou objets à examiner (art. 3(g))</i>	Not Applicable
12.	Any requirement that the evidence be given on oath or affirmation and any special form to be used (Art. 3(h))* <i>Demande de recevoir la déposition sous serment ou avec affirmation et, le cas échéant, indication de la formule à utiliser (art. 3(h))</i>	Not Applicable
13.	Special methods or procedure to be followed (e.g., oral or in writing, verbatim transcript or summary, cross-examination, etc.) (Arts 3(i) and 9)* <i>Formes spéciales demandées (déposition orale ou écrite, procès-verbal sommaire ou intégral, "cross-examination", etc.) (art. 3(i) et 9)</i>	Not Applicable
14.	Request for notification of the time and place for the execution of the Request and identity and address of any person to be notified (Art. 7)* <i>Demande de notification de la date et du lieu de l'exécution de la requête, de l'identité et de l'adresse de la ou des personnes à informer (art. 7)</i>	Not applicable
15.	Request for attendance or participation of judicial personnel of the requesting authority at the execution of the Letter of Request (Art. 8)* <i>Demande d'assistance ou de participation des magistrats de l'autorité requérante à l'exécution de la commission rogatoire (art. 8)</i>	Not applicable

16.	Specification of privilege or duty to refuse to give evidence under the law of the Requesting State (Art. 11(b))* <i>Spécification des dispenses ou interdictions de déposer prévues par la loi de l'État requérant (art. 11(b))</i>	Not applicable
17.	The fees and costs incurred which are reimbursable under the second paragraph of Article 14 or under Article 26 of the Convention will be borne by:* <i>Les taxes et frais donnant lieu à remboursement en vertu de l'article 14, alinéa 2 et de l'article 26 seront réglés par :</i>	Kerry S. Culpepper, 75-170 Hualalai Road, Suite B204; Kailua-Kona, HI 96740 tel: 808-464-4047
Date of request <i>Date de la requête</i>		July 19, 2022
Signature and seal of the requesting authority <i>Signature et sceau de l'autorité requérante</i>		 Anthony J. Trega United States District Judge

*Omit if not applicable / Ne remplir qu'en cas de nécessité

IP	Notice Amount
89.187.164.179	5240
89.187.182.111	744
89.187.171.116	715
89.187.182.106	579
84.17.35.72	550
89.187.171.111	537
156.146.50.1	484
156.146.50.134	457
156.146.50.65	450
84.17.44.152	441
156.146.50.198	431
89.187.187.129	421
156.146.47.11	412
84.17.45.211	410
89.187.187.162	404
212.102.46.40	369
212.102.45.58	365
89.187.170.129	363
89.187.178.22	362
212.102.45.28	356
212.102.45.53	352
212.102.45.23	350
138.199.42.160	348
212.102.45.78	345
212.102.45.98	343
212.102.45.68	332
89.187.177.241	329
212.102.45.63	328
212.102.45.43	325
185.246.209.230	325
212.102.45.18	320
156.146.46.1	318
212.102.45.3	317
212.102.45.83	316
185.246.209.88	315
89.187.178.47	315
156.146.46.134	314
212.102.45.8	313
212.102.45.73	312
212.102.45.93	306
89.187.177.246	305
212.102.45.48	304
89.187.182.152	303

84.17.35.94	301
84.17.63.1	300
212.102.45.38	300
89.187.164.96	297
89.187.175.3	293
89.187.178.52	288
212.102.45.88	287
84.17.41.72	286
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156.146.52.139	279
212.102.45.13	276
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89.187.178.2	271
212.102.59.129	270
212.102.58.113	269
185.152.66.139	266
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84.17.41.176	265
156.146.42.134	265
84.17.41.84	263
156.146.39.6	262
156.146.58.1	261
156.146.58.134	258
156.146.37.129	257
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89.187.187.72	247
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156.146.36.225	244
156.146.55.198	243
89.187.178.93	241
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185.152.67.131	234
89.187.177.121	233
138.199.40.163	232
138.199.2.51	229
84.17.41.131	228
37.19.220.200	228
89.187.175.115	227

84.17.41.76	227
84.17.41.78	224
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212.102.45.109	205
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212.102.60.133	178
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138.199.42.144	157
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212.102.60.178	156
212.102.60.132	155
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84.17.45.15	99
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89.187.182.67	98
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156.146.36.86	97
156.146.36.81	97
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84.17.45.104	96
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